

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION**

Case No. 4:22-MD-03047-YGR  
MDL No. 3047

### This Document Relates to:

## **PLAINTIFFS' NOTICE AND REQUEST FOR PRODUCTION OF DOCUMENTS**

## ALL ACTIONS

**PROPOUNDERING PARTY: MDL Personal Injury and Local Government Plaintiffs**

**RESPONDING PARTIES:** Meta Platforms, Inc.; Facebook Payments, Inc.; Siculus, Inc.; Facebook Operations, LLC; Instagram, LLC

**SET:**

**DATE OF SERVICE:** December 6, 2023

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs, through the undersigned counsel, propound the following set of Requests for Production of Documents on the above-named Responding Party or Parties. Responses to these Requests for Production, or objections in lieu thereof, shall be served within 30 days after service of this document.

## I. DEFINITIONS

1.     **“Including”** means “including, without limitation” and “including but not limited to.”

2.     **“You,” “Your,” “Defendant,” or “Defendants”** means the above-named Responding Party or Parties (individually and, where applicable, collectively); each of their predecessor or successor business entities; each foreign or domestic governmental, nongovernmental, or private corporation or entity with which they are commonly owned, including subsidiaries and parent corporations; each of their former or present Units; and for each of the foregoing all former or present directors, officers, members, partners, principals, employees,

1       6.       If no Documents responsive to a particular Request exist, you must state that no  
2 responsive Documents exist.

3       7.       If You have already produced to the MDL or JCCP Plaintiffs all Documents that are  
4 responsive to a request, please identify in your response the beginning Bates number for each such  
5 Document.

6       8.       If any of the Documents or information requested cannot be produced in full, You  
7 are required to specify, to the extent possible, the reasons for Your inability to produce the  
8 remainder, and the approximate date when You expect to produce such Documents, if at all.

9       9.       If any Document is known to have existed but no longer exists, has been destroyed  
10 (whether intentionally, accidentally, or otherwise), or is otherwise unavailable, You must identify  
11 the Document, the date and reason for its loss, destruction, or unavailability, the name of each Person  
12 known or reasonably believed by Defendant to have present possession, custody, or control of the  
13 original and any copy thereof (if applicable), and a description of the disposition of each copy of the  
14 Document.

15      10.      This Notice and Request is continuing in nature and You shall supplement Your  
16 responses according to applicable law. If, after producing Documents or information responsive to  
17 this Request, additional responsive information or Documents become available to You, You are  
18 required to produce such additional Documents or information.

19      11.      Unless otherwise indicated, the relevant time period for the information sought is  
20 from the date You first researched, designed, or developed the Facebook Platform or any of its  
21 predecessors to the present (“Relevant Time Period”). All Documents requested shall include all  
22 Documents and information that relate in whole or in part to the Relevant Time Period, or to events  
23 or circumstances during such Relevant Time Period, even though dated, prepared, generated, or  
24 received prior. If a Document prepared before the Relevant Time Period is necessary for a correct  
25 or complete understanding of any Document covered by a Request, you must produce the earlier  
26 Document as well. If a Document is undated or the date of its preparation cannot be ascertained, and  
27 the Document is otherwise responsive to Request, you must produce the Document.

28

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on December 6, 2023 to the following, Counsel for Defendants Meta Platforms, Inc.; Facebook Payments, Inc.; Siculus, Inc.; Facebook Operations, LLC; Instagram, LLC:

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